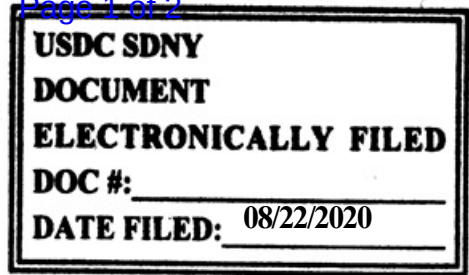


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MEMO ENDORSED

August 21, 2020

VIA ECF

Honorable Katharine H. Parker, U.S.M.J.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 17D
New York, New York 10007

Re: Cortese v. Skanska Koch, Inc., et al
Civil Action No. 1:20-cv-01632 (LJL)

Dear Judge Parker

This firm represents plaintiff Anthony Cortese, both individually and behalf of all similarly situated individuals ("Plaintiff"). We write with the consent of all parties to request an adjournment of the settlement conference currently scheduled for September 8, 2020.

Since our initial scheduling call on July 28, 2020, our office has been contacted by a number of former workers on the Bayonne Bridge Project and, to date, has been retained by one (1) additional former employee to be a named plaintiff. Our office has shared a draft proposed Third Amended Complaint with counsel, but it is not yet finalized as we are awaiting additional information from the new client as well as potential retainer agreements with additional named plaintiffs.

Due to the fact that the parties have agreed to a settlement conference in an effort to resolve these individual claims prior to a collective or class action being certified, we will not be in a position to do so until after all of the named individual plaintiffs have been identified and the Third Amended Complaint has been filed. Accordingly, we respectfully request that the settlement conference be adjourned until at least October 8, 2020 to provide the parties an opportunity to finalize the pleadings and gather information relevant to the claims of the named plaintiffs so that we are in a better position to discuss settlement of the individual claims.

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Honorable Katharine H. Parker, U.S.M.J.
August 21, 2020
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We thank the Court for its time and attention to this matter and are available at Your Honor's convenience should any additional information be necessary.

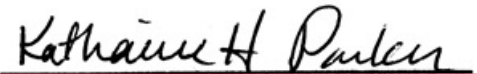
Respectfully submitted,

/s/Michael Ansell
Michael H. Ansell

MA:s
cc: All counsel of record (via ECF)

APPLICATION GRANTED: The settlement conference in this matter currently scheduled for Tuesday, September 8, 2020 at 2:00 p.m. is hereby rescheduled to **Wednesday, November 11, 2020 at 10:00 a.m.** Counsel is directed to call Judge Parker's teleconference line at the scheduled time. **Please dial (866) 434-5269, Access code: 4858267.** The parties are instructed to complete the Settlement Conference Summary Report and prepare pre-conference submissions in accordance with Judge Parker's Individual Rules of Practice. Pre-conference submissions must be received by the Court no later than **November 4, 2020 by 5:00 p.m.**

APPLICATION GRANTED



Hon. Katharine H. Parker, U.S.M.J.

08/22/2020